BELLSOUTH

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FOR PUBLIC INSPECTION

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August 5, 2002

WRITTEN EX PARTE

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms Dortch:

On July 17, 2002, at the request of the FCC staff reviewing BellSouth's pending 271 applications, BellSouth filed a report entitled "PMAP 4 System Analysis." After reviewing that report, the staff had additional questions that it requested BellSouth answer in writing and file in this docket. Attached are those questions and answers. At their request I am also sending the attached questions and answers electronically to the following FCC staff: Michelle Carey; Aaron Goldberger; and Daniel Shiman. I am requesting confidential treatment for the answer to the first question, to the extent that it contains CLEC-specific information, subject to the terms of the Protective Order issued in this docket on June 20, 2002.

In accordance with Commission rules, I am enclosing one original copy of this letter with the confidential data included. I am also enclosing for public inspection two copies of this letter with those data redacted. Inquiries about access to the confidential material submitted with this letter should be directed to Laura Brennan, Kellogg, Huber, Hansen, Todd & Evans, 1615 M Street, N.W., Suite 400,

Washington, D.C., 20036, 202.367.7821. Please call me if you have any questions about this filing.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Michelle Carey
Aaron Goldberger
Daniel Shiman
Susan Pié
James Davis-Smith

Question 1: Explain the difference in the numerator for measure B.1.4.14 for March v2.6 and v.4.0.

Response: The difference in the numerator between the two PMAP versions is related to a time zone normalization in which BellSouth had erroneously added an hour to the interval in PMAP 2.6. When the time zone issue is remedied, it takes an hour out of the calculation and causes the numerator to change by including the 9 records described below:

CC	PON	VER	4.0 Start Time	2.6 Start Time	4.0 End Time	2.6 End Time	4.0 Duration (Minutes)	2.6 Duration (Minutes)
*****	**********	**	3/12/2002 1:17:57 PM	3/12/2002 1:18:01 PM	3/12/2002 1:18:23 PM	3/12/2002 2:18:23 PM	0.43	60.6
*****	**********	**	3/12/2002 1:37:12 PM	3/12/2002 1:37:16 PM	3/12/2002 1:38:52 PM	3/12/2002 2:38:52 PM	1.67	61.8
*****	**********	**	3/14/2002 1:44:49 PM	3/14/2002 1:44:55 PM	3/14/2002 1:50:30 PM	3/14/2002 2:50:30 PM	5.68	65.4
*****	**********	**	3/14/2002 8:03:13 AM	3/14/2002 8:03:15 AM	3/14/2002 8:05:21 AM	3/14/2002 9:05:21 AM	2.13	62.4
*****	**********	**	3/14/2002 9:22:44 AM	3/14/2002 9:22:45 AM	3/14/2002 9:23:05 AM	3/14/2002 10:23:05 AM	0.35	60.6
*****	**********	**	3/14/2002 9:43:24 AM	3/14/2002 9:43:26 AM	3/14/2002 9:51:54 AM	3/14/2002 10:51:54 AM	8.5	68.4
*****	**********	**	3/29/2002 9:53:52 AM	3/29/2002 9:54:02 AM	3/29/2002 9:54:55 AM	3/29/2002 10:54:55 AM	1.05	60.6
*****	**********	**	3/29/2002 3:03:13 PM	3/29/2002 3:03:23 PM	3/29/2002 3:04:24 PM	3/29/2002 4:04:24 PM	1.18	61.2
*****	**********	**	3/29/2002 3:02:46 PM	3/29/2002 3:02:55 PM	3/29/2002 3:03:25 PM	3/29/2002 4:03:25 PM	0.65	60.6

This issue was addressed in the April data notification and the corresponding industry conference call.

Question 2: Does the statement "PMAP 4.0 is properly identifying the reject, but because the start time is out of sequence with the previous starts, it is not flagged for inclusion in the measure," indicate a problem with PMAP 4.0? If so, and if the impact of the problem is significant, please explain further.

Response: This issue deals with the start times of transactions for rejects. It is a PMAP 4.0 issue that is scheduled for a fix once we have complied fully with the change notification procedure required by the Georgia Public Service Commission. The impact of this issue, however, is negligible. Across all nine states, the problem affected only 0.59% of total rejects in March, and 0.58% of total rejects in April. Thus, it does not have a significant impact on the reliability of the performance data.

Question 3: Is the use of the "Latest Service Order Earliest Ticket" rule for calculating the % Provisioning Troubles Within 30 Days a change in the SQM business rules? If so, should notice have been given to CLECs and regulators and was such notice given?

Response: In PMAP 2.6, if there were multiple service orders on a circuit (assume, for example, three service orders), and there was a single trouble ticket on that circuit, PMAP 2.6 would count the trouble as three troubles (one for each service order). BellSouth did not view this as the best way to implement the intent of the SQM. Consequently, in PMAP 4.0, the code takes the last service order in the sequence and matches it with the earliest trouble ticket. While this change could be construed as a change in a "business rule," the change was made to be more compliant with the intent of the SQM. BellSouth provided notice of this change via the April Data Notification and the corresponding

industry conference call. The impact of this change is small, affecting less than 1% of the base of service orders.

Question 4: BellSouth notes on pages 85-6 of the Report that PMAP 2.6 identified 3 service orders as UNE 2w Analog Loop Design with LNP, but PMAP 4.0 did not identify the same service orders as LNP service orders. Is there a PMAP 4.0 problem in identifying LNP records?

Response: The three service orders in question were not LNP service orders. PMAP 2.6 checked the LON ordering system to get the LNP designation for loop orders. When PMAP 2.6 performed this check, if the LON system indicated the order was an LNP order, PMAP 2.6 checked no farther and marked the order as an LNP order. While this protocol was not incorrect, it didn't give PMAP the flexibility to account for possible errors with the source data, *i.e.*, the LON records. PMAP 4.0, on the other hand, checks the LON system, but also performs additional checks in the LNP Gateway. If it finds a conflict in the information in those different systems, PMAP 4.0 defaults back to the base product (i.e. 2w Analog Loop Design) without the LNP designation. In essence, PMAP 2.6 assumed that LON was right (even though LON can contain human errors), and PMAP 4.0 does not make that assumption. As BellSouth has discussed, PMAP 4.0 contains more robust product identification methodologies and therefore is a more cautious approach to product identification than PMAP 2.6.